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15 Attorneys for Plaintiff  
16 UNITED STATES OF AMERICA

17 UNITED STATES DISTRICT COURT

18 FOR THE CENTRAL DISTRICT OF CALIFORNIA

19 UNITED STATES OF AMERICA,

20 No. 2:22-CR-00593-PA

21 Plaintiff,

22 v.  
23 GOVERNMENT'S EX PARTE APPLICATION  
24 ANTHONY DAVID FLORES,  
25 aka "Anton David," and  
26 ANNA RENE MOORE,  
27 Defendants.

28 STATEMENT AND EXHIBITS TO  
GOVERNMENT'S SENTENCING POSITION

1 Plaintiff United States of America, by and through its counsel  
2 of record, the United States Attorney for the Central District of  
3 California and Assistant United States Attorney Andrew M. Roach,  
4 hereby applies ex parte for an order that the Victim Impact Statement  
5 and Government's Exhibits to Sentencing Position be filed under seal.

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This ex parte application is based upon the attached declaration of Andrew M. Roach.

Dated: June 3, 2024

Respectfully submitted,

E. MARTIN ESTRADA  
United States Attorney

CAMERON L. SCHROEDER  
Assistant United States Attorney  
Chief, National Security Division

/s/ Andrew M. Roach

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ANDREW M. ROACH

Assistant United States Attorney

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

**DECLARATION OF ANDREW M. ROACH**

I, Andrew M. Roach, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in this case.

6       2. The government requests that the Court file under seal the  
7 documents filed concurrently herewith, the Victim Impact Statement  
8 and Government's Exhibits to Sentencing Position, because the  
9 attached exhibits reference the victim's name and other sensitive  
10 personal information. The government requests this under the Crime  
11 Victims' Rights Act. The government requests to file these documents  
12 under seal because they are all subject to the protective order in  
13 this case, and it would be unduly burdensome for the government to  
14 redact the entirety of the documents.

15       3. I have communicated with defendant Anthony David Flores's  
16 attorney, Ambrosio E. Rodriguez, who does not oppose this filing.

17       4. Should the Court deny this application, the government  
18 requests that this application not be filed, but be returned to the  
19 government, without filing of the documents or reflection of the name  
20 or nature of the documents on the clerk's public docket.

21 I declare under penalty of perjury under the laws of the United  
22 States of America that the foregoing is true and correct and that  
23 this declaration is executed at Los Angeles, California, on June 3,  
24 2024.

  
ANDREW M. ROACH